

**Ronald D. Richards Jr.**  
P: 517.371.8154 F: 517.367.7154  
rrichards@fosterswift.com

313 S. Washington Square  
Lansing MI 48933

June 21, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-B204  
Washington, DC 20554

**RE: Report Required in WC Docket No. 10-90 Regarding FCC Rules 54.313(a)(2) through (6) and (h).**

Dear Ms. Dortch:

The following information is submitted by Thumb Cellular, LLC pursuant to WC Docket No. 10-90 as specified in the Public Notice released May 8, 2012 (DA 12-729). Please contact me with any questions.

Respectfully,



Ronald D. Richards Jr.  
Attorney for Thumb Cellular, LLC  
Foster, Swift, Collins & Smith, P.C.

cc: USAC  
MPSC

**54.313(a)(2)**

ETCs are required to submit detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect

- (i) At least ten percent of the end users served in a designated service area; or
- (ii) A 911 special facility, as defined in 47 CFR 4.5(e)

**Company Response:**

Thumb Cellular, LLC experienced three (3) outages in 2011 that meet criteria.

The first outage occurred on April 6, 2011, from 5:00 a.m. to 8:30 a.m. There was a power issue in a main hub in Caro, MI, which affected the services on the transport equipment at this location. A power overload brought down the main transport; it was found that back-up modules were burned out and grounding was excessive during testing. The outage was resolved by powering down the last piece of equipment causing the overload and replacing the power modules. The outage affected transport services for LATA 340 tandem traffic and cell site traffic, including voice, data and E911 services. The geographic areas affected were the Tuscola and Sanilac County cell sites and all terminating calls to LATA 340 from LATA 340 exchanges transited from the tandem. The steps taken were to replace the burned out power modules and to evaluate and upgrade the hub site before any more equipment is allowed in the site. Grounding at each cell site was also examined and tested to ensure that it is adequate, appropriate and within engineering guidelines. The outage had the potential to affect approximately 35,266 wireless users, but fewer blocked calls (18,816) actually occurred.

The second outage occurred on May 29, 2011, at 6:50 p.m. Ten cell sites went out of service due to a service-provider-owned DS3 equipment malfunction at the Carsonville, MI, hub location caused by a lightning strike which burned out the equipment. The outage was resolved by replacing the equipment. All traffic/services at the ten cell sites was affected. The geographic areas affected were those areas of Sanilac County served by the cell sites. The steps taken were to replace the equipment and provide for spare equipment on site. The outage had the potential to affect approximately 7800 wireless users estimated according to 10 out of 46 cell sites.

The third outage occurred on May 31, 2011, at 3:07 p.m. for approximately one hour. Two air conditioning units servicing the remote hub location in Caro, MI, went out, causing equipment to overheat because of high temperature weather. The outage was resolved by having technicians repair the air conditioning and manually cool and reset the power modules and transport equipment to keep it from overheating. Voice, data, and E911 services were intermittently out of service for 28 cell sites and LATA 340 trunks. The geographic areas affected were the areas of Tuscola and Sanilac Counties served by the cell sites. New larger air conditioners, including a portable air conditioning unit that can be taken to any cell site or remote location for high temperature incidents are being researched and purchased. The outage had the potential to affect approximately 21,700 wireless users estimated according to 28 out of 46 cell sites.

**54.313(a)(3)**

ETCs are required to report the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. The carrier shall also detail how it attempted to provide service to those potential customers.

Company Response

No requests for service were unfulfilled.

**54.313(a)(4)**

ETCs are required to report the number of complaints per 1,000 connections in the prior calendar year.

Company Response

Thumb Cellular, LLC received two (2) formal complaints regarding service quality in 2011, which amounts to less than one (1) per 1,000 connections. Both were successfully resolved.

**54.313(a)(5)**

ETCs are required to certify that it is complying with applicable service quality standards and consumer protection rules.

Company Response

Thumb Cellular, LLC certifies that is complying with applicable service quality standards and consumer protection rules.

**54.313(a)(6)**

ETCs are required to certify that are able to function in emergency situations as set forth in §54.202(a)(2).

Company Response

Thumb Cellular, LLC certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).

**54.313(h)**

All incumbent local exchange carrier recipients of high-cost support that offer flat rates for residential local service that, when combined with certain state fees, are below the local urban rate floor are required to report lines and rates in effect for those rate plans as of January 1, 2011. The urban rate floor for the 2012 filing is \$10 per month. State fees are defined pursuant to §54.318(e) of this subpart and the local urban rate floor as defined in §54.318 of this subpart.

Company Response

No rate plans, including state fees, are below the urban rate floor.

Certified by:



Neal B. Eichler  
Vice President  
Thumb Cellular, LLC  
7585 W. Pigeon Rd  
P. O. Box 650  
Pigeon, MI 48755  
(989) 453-4391